



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** DEC 06 2018

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Holmes Road Recycling Company, Inc., Houston, Texas

**FROM:** Scott Connolly, Environmental Engineer  
AECAB (IL/IN)

**THRU:** Nathan Frank, Section Chief  
AECAB (IL/IN)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Holmes Road Recycling Company, Inc.

**Facility Location:** 2820 Holmes Road, Houston, Texas 77051

**Date of Inspection:** November 8, 2018

**EPA Inspectors:**

1. Scott Connolly, Environmental Engineer
2. Natalie Topinka, Environmental Scientist

**Other Attendees**

1. Tim Engels, Operations Manager, Holmes Road Recycling

**Contact Email Address:** [tim.engles@holmesroadrecycling.com](mailto:tim.engles@holmesroadrecycling.com)

**Purpose of Inspection:** To determine compliance with the Clean Air Act

**Facility Type:** Metal shredding and recycling yard

**Regulations Central to Inspection:** 40 C.F.R. Part 82, Subpart F: Recycling and Emissions Reduction

**Arrival Time:** 3:15 pm

**Departure Time:** 4:35 pm

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Tim Engels unless otherwise noted.

**Process Description:**

The facility purchases and processes scrap metal received by truck from feeder yards, industrial clients and from the general public. Scrap inspectors check the incoming metal items for non-conforming material during unloading into scrap piles, depending on material and available space. Larger scrap pieces are torch cut into sizes that can be fed into the shredder. The shredder processes the piles of ferrous postconsumer and industrial scrap. Cranes load scrap metal onto a conveyor, which feeds the metal into the hammermill shredder. The hammermill is equipped with an automatic water injection system, which sprays water into the shredder to reduce dust and to cool the metal. Shredded metal exits the shredder and is fed through a magnetic separator, which separates non-magnetics from ferrous metal. Eddy current separators removes nonferrous metals from non-metallic fluff that is sent to a landfill. Air emissions from the hammermill shredder are controlled by a dedusting baghouse and stack.

**Staff Interview:** The facility intends to have all appliances properly drain prior to arrival, but facility staff stated that it also operates refrigerant recovery equipment to recover refrigerants and verify that refrigerants have been recovered. Mr. Engels stated that the facility maintains contracts with several appliance recyclers require the supplier to recover refrigerant and that a verification statement may be used with other suppliers. The facility operates a 1750 horsepower diesel engine to power its hammer mill shredder. The shredder was purchased recently from an existing operation and started processing scrap in June 2018. The facility does not feed cars into the shredder and instead soft crushes them for transport to a larger shredding facility.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

Facility staff were unable to locate the refrigerant recovery equipment or the technician that operates the equipment. An intact air conditioning unit was observed on site. Visible emissions were observed exiting the shredder infeed hood above the infeed conveyor.

**Photos and/or Videos:** were taken during the inspection.

A photo log is contained in Appendix A.

**Field Measurements:** were not taken during this inspection.


**CLOSING CONFERENCE**

**Requested documents:**

- Contracts between Holmes Road Recycling and appliance suppliers
- Verification Statement
- Verification of onsite refrigerant recovery
- Documentation of use of refrigerant recovery equipment

**Compliance Assistance:** The facility was provided a copy of 40 C.F.R. Part 82, Subpart F.

**SIGNATURES**

Report Author:  Date: 11/28/18

Section Chief:  Date: 12/6/18

**Facility Name:** Holmes Road Recycling Company, Inc.  
**Facility Location:** 2820 Holmes Road, Houston, Texas  
**Date of Inspection:** November 8, 2018

**APPENDICES AND ATTACHMENTS**

I. Appendix A: Digital Image Log

**Facility Name:** Holmes Road Recycling Company, Inc.

**Facility Location:** 2820 Holmes Road, Houston, Texas

**Date of Inspection:** November 8, 2018

**APPENDIX A: DIGITAL IMAGE LOG**

|   |  |
|---|--|
| <b>1. Photographer Name:</b><br>Natalie Topinka                         | <b>2. Date of Inspection:</b><br>November 8, 2018  |
| <b>3. Company/Facility Name:</b><br>Holmes Road Recycling Company, Inc. | <b>4. Street Address, City, State:</b><br>2820 Holmes Road, Houston, Texas   |
| <b>5. Number of Images:</b><br>5  | <b>6. Archival Record Location:</b><br><a href="https://usepa-my.sharepoint.com/:f/g/personal/connolly_scott_epa_gov/EknHP8VL2NBIgJV-wxeGI3ABA3PUhVrdg7-EHkwhMp6slQ?e=4CcIoj">https://usepa-my.sharepoint.com/:f/g/personal/connolly_scott_epa_gov/EknHP8VL2NBIgJV-wxeGI3ABA3PUhVrdg7-EHkwhMp6slQ?e=4CcIoj</a> |

| Image Number | File Name    | Date and Time   | Latitude and Longitude   | Description of Image                    |
|--------------|--------------|-----------------|--------------------------|---|
| 1            | PB080065.JPG | 11/8/2018 17:15 | 29.68,<br>-95.325556     | Holmes Road Recycling sign and entrance |
| 2            | PB080066.JPG | 11/8/2018 18:01 | 29.673333,<br>-95.385556 | Intact Air conditioning unit            |
| 3            | PB080067.JPG | 11/8/2018 18:01 | 29.673037,<br>-95.385782 | Holmes Road Recycling facility overview |
| 4            | PB080068.JPG | 11/8/2018 18:02 | 29.67289,<br>-95.385693  | Holmes Road Recycling stack pile        |
| 5            | PB080069.JPG | 11/8/2018 18:03 | 29.672778,<br>-95.385556 | Visible emissions exiting the shredder  |

